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Hon. William J. Martini, U.S.D.J. (via Pacer)  
United States District Court  
District of New Jersey  
Martin Luther King Jr. Building & U.S. Courthouse  
50 Walnut Street – Room 4076  
Newark, N.J. 07101

March 5, 2021

Re: Wyckoff Properties, LP, et al. v. Selective Insurance Co., et al.  
U.S.D.C., D.N.J., No. 2:21-cv-00238-WJM-MF

Dear Judge Martini:

I represent the Plaintiffs in the above-entitled matter.

On February 24, 2021, I filed a Brief in Opposition to the Motion to Dismiss filed on behalf of Zurich American Insurance Company. As submitted, the brief was not in compliance with the U.S.D.C.N.J. Rules regarding the length and formatting of briefs.

I apologize for my mistake in not submitting this request prior to the filing of my brief. However, I wish to make the request now for permission to file the non-compliant brief which was dated February 24<sup>th</sup>. The matter in question involves complex insurance coverage issues, many of which are of first impression, not only in New Jersey but nationwide. There are opinions and decisions being handed down on issues very similar to and/or bearing upon the issues in this case every week which the parties in this case have to address. I will certainly not object to any request by my adversaries in this litigation to submit briefs which are longer than normally permitted by local Rule.

Thank you for your consideration of the above.

Respectfully submitted,  
Smith, Crotty, Meyer & Bruins

  
By: Francis P. Crotty

FPC/lo

cc: Hon. Mark Falk (via Pacer)  
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